

Clement J. Naples
Direct Dial: 212.906.1331
clement.naples@lw.com

1271 Avenue of the Americas
New York, New York 10020-1401
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

LATHAM & WATKINS LLP

June 28, 2024

VIA ECF

Hon. Kenneth M. Karas, U.S.D.J.
United States District Court for the Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

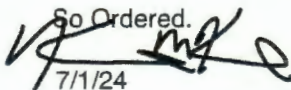
Re: *GlobalFoundries U.S. Inc. v. Intl. Bus. Machines Corp.*,
Case No. 7:23-cv-03348-KMK-AEK (S.D.N.Y.) – Letter Motion to Seal

Dear Judge Karas:

We write on behalf of Plaintiff GlobalFoundries U.S. Inc. ("GF") to request an order authorizing the redacted and sealed filings of GF's June 28, 2024 Memorandum of Law In Support of Its Objection To The June 14, 2024 Discovery Order ("Objection"), the Declaration of Corey A. Calabrese In Support of GF's Objection ("Declaration"), and certain exhibits thereto. The Objection, Declaration, and Exhibits A, C, E-H, and I contain or reflect information that has been designated by GF or International Business Machines Corporation ("IBM") as "Confidential" or "Highly Confidential" under the operative protective order, ECF No. 149. Additionally, GF respectfully requests to file Exhibits E and G in paper format as they are designated Export Controlled Information by IBM. Lastly, Exhibit A has been filed under seal because there is a pending dispute regarding the scope of the redactions to the March 7, 2024 Hearing Transcript.

We thank the Court for its consideration.

Granted.

So Ordered.

7/1/24

Respectfully submitted,

/s/ Clement J. Naples
Clement J. Naples

cc: All counsel of record (via ECF)